

United States Courts
Southern District of Texas
FILED

APR 02 2019

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

vs.

DEMETRIUS DELAAN WHITE
aka D and DEONTE DANQUISE
BAILEY-ROACH aka SHEIN,

Defendants.

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Case No. **19 CR 228**

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment:

1. The term “minor” is defined, pursuant to 18 U.S.C. § 2256(1), as “any person under the age of eighteen years.”

2. The term “child pornography,” for purposes of this Indictment, is defined, pursuant to 18 U.S.C. § 2256(8)(A), as

any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where –

(A) the production of such visual depiction involves the use of a minor engaged in sexually explicit conduct.

3. The term “sexually explicit conduct” is defined, pursuant to 18 U.S.C. § 2256(2), as any

actual or simulated –

- (i) sexual intercourse, including genital [to] genital, oral [to] genital, anal [to] genital, or oral [to] anal, whether between persons of the same or opposite sex; [or]
- (ii) bestiality; [or]
- (iii) masturbation; [or]
- (iv) sadistic or masochistic abuse; or
- (v) [the] lascivious exhibition of the genitals or pubic area of any person.

4. The term “computer” is defined, pursuant to 18 U.S.C. §§ 2256(6) and 1030(e)(1) as any

electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical, arithmetic, or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device, but such term does not include an automated typewriter or typesetter, a portable hand held calculator or other similar device.

5. The term “producing” is defined, pursuant to 18 U.S.C. § 2256(3), as producing, directing, manufacturing, issuing, publishing or advertising, and includes downloading images from another source, buy using materials, including a computer or parts thereof.

6. The term “visual depiction” is defined, pursuant to 18 U.S.C. § 2256(5) as including, but is not limited to, any

undeveloped film and videotape, and data stored on computer disk or by electronic means which is capable of conversion into a visual image.

COUNT ONE

Coercion and Enticement of a Minor

On or about November 6, 2017, within the Southern District of Texas, and elsewhere, the Defendants,

**DEMETRIUS DELAAN WHITE aka D and
DEONTE DANQUISE BAILEY-ROACH aka SHEIN,**

did use any facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce, and to knowingly attempt to persuade, induce, entice and coerce Minor Victim 1 ("MV1"), an individual who had not attained the age of 18 years, to engage in prostitution and sexual activity for which the Defendants could be charged with a criminal offense,

in violation of 18 U.S.C. §§ 2422(b) & (2).

COUNT TWO

Conspiracy to Produce Child Pornography

On or about November 6, 2017, within the Southern District of Texas, and elsewhere,

**DEMETRIUS DELAAN WHITE aka D and
DEONTE DANQUISE BAILEY-ROACH aka SHEIN,**

the Defendants herein, did combine, conspire, confederate and agree together to employ, use, persuade, induce, entice and coerce a minor, namely MV1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer,

in violation of 18 U.S.C. §§ 2251(a) & (c) and 2.

COUNT THREE
Production of Child Pornography

On or about November 6, 2017, within the Southern District of Texas and elsewhere,

**DEMETRIUS DELAAN WHITE aka D and
DEONTE DANQUISE BAILEY-ROACH aka SHEIN,**

Defendants herein, did employ, use, persuade, induce, entice and coerce and attempt to employ, use, persuade, induce, entice and coerce a minor, MV1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer,

in violation of 18 U.S.C. §§ 2251(a) and 2.

NOTICE OF FORFEITURE
18 U.S.C. § 2253(a)

Pursuant to 18 U.S.C. § 2253(a), the United States gives the Defendants

**DEMETRIUS DELAAN WHITE aka D and
DEONTE DANQUISE BAILEY-ROACH aka SHEIN,**

notice that in the event of conviction for the offenses charged in Counts One through Three of the Indictment, the following is subject to forfeiture:

- (1) all visual depictions described in 18 U.S.C. § 2251, or all books, magazines, periodicals, films, videotapes, or other matter which contain any such visual depictions, which were produced, transported, mailed, shipped or received in violation of 18 U.S.C. Chp. 110;

- (2) all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and
- (3) all property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or all property traceable to such property.

The property subject to forfeiture includes, but is not limited to, the following:

A black Samsung Galaxy S8 cellular phone, IMEI 355987081390733

A black Apple iPhone, IMEI 359402083718507

A True Bill:

ORIGINAL SIGNATURE ON FILE
Grand Jury Foreperson

RYAN K. PATRICK
United States Attorney

By: Kate Suh
Eun Kate Suh
Assistant United States Attorney